

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

INGE GOODSON,)	
Plaintiff,)	
)	
v.)	Case No. 1:12-cv-00065
)	
BANK OF AMERICA, N.A.)	
Defendant.)	

MOTION TO RESCHEDULE TRIAL

Plaintiff Inge Goodson, by counsel, hereby moves the Court to reschedule the trial in this matter from its current date of January 21, 2014, with the mandatory pretrial hearing date of January 13, 2013. Good cause exists for the requested rescheduling as follows:

1. As Plaintiff's counsel previously informed the Court, Plaintiff's lead counsel was scheduled for a significant medical procedure, which was anticipated to require an 8-12 week recuperation period. Plaintiff's lead counsel underwent that procedure on November 18, 2013. Lead counsel is not able to work for extended periods (and is not able to travel on commercial air carriers) until an anticipated 12-14 weeks post-surgery. The currently anticipated date for lead Plaintiff's counsel to do so is late February 2014.

2. Currently pending before the Court is a motion for summary judgment (Dkt. Nos. 20-22; 25-26). Moving the trial date will allow additional time to consider the pending summary judgment motion.

3. Trial in the related case of *Goodson v. Shaprio & Kirsch, LLP*, pending before this Court, is set for April 8, 2014, with a final pretrial on March 24, 2014. In the past, counsel for Plaintiff did not oppose Shaipro & Kirsch's motion to postpone the trial in that case against Shapiro & Kirsch, LLP, which put that trial after the BANA trial, due to lead counsel's

“continuing health issues.” *Goodson v. Shapiro & Kirsch, LLP*, 1:11-cv-31 (M.D. Tenn.), Dkt. 121. Plaintiff respectfully suggests that the trial date in May 2014, after the trial in the Shapiro & Kirsch case, would be more efficient (or the cases should be consolidated, but BANA has opposed consolidation in the past, so Plaintiff therefore requests the trial date in May). A jury’s determination of facts in the Shapiro & Kirsch matter could streamline trial in the present case against BANA, as the facts found in the Shapiro & Kirsch case, with Shapiro & Kirsch acting as agent for BANA, would help streamline the present case.

4. Plaintiff therefore requests that trial in this matter be moved to May 2014, with a final pretrial in late April or early May 2014.

5. On December 30, 2013, undersigned counsel emailed the issues discussed in the motion to counsel for Defendant, but, likely due to the holidays, has not heard from Defendant whether it consents or oppose the motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via electronic filing this 31st day of December, 2013 to the following counsel of record:

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